

Before the
Federal Communications Commission
Washington, D.C. 20554

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JUL 11 1997
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
Access Charge Reform) CC Docket No. 96-262
)

**REPLY COMMENTS OF
SOUTHWESTERN BELL TELEPHONE COMPANY,
PACIFIC BELL, AND NEVADA BELL**

Southwestern Bell Telephone Company, Pacific Bell, and Nevada Bell, (collectively "the SBC Companies"), pursuant to the Access Reform First Report and Order¹ released by the Federal Communications Commission (Commission) on May 16, 1997, hereby file their Reply Comments to the Comments filed June 26, 1997.

The SBC Companies urge the Commission not to adopt its tentative conclusion to impose PICCs on special access lines. There is no support in the Comments, and thus, in the record, for such a charge to be adopted. The adoption of the Commission's tentative conclusion would therefore be wholly arbitrary and capricious.

The SBC Companies also agree with BellSouth and others² who state that the Commission should not adopt any reallocation of any expenses for the use of general purpose computers for billing and collection functions in FCC Part 69 at this time. BellSouth correctly points out that even the Commission has acknowledged that access cost allocations are linked to separations procedures and that the Commission has stated that separations reform will be addressed in the near

¹ Access Charge Reform, First Report and Order, CC Docket No. 96-262, (FCC 97-158) (released May 16, 1997) (Access Reform First Report and Order).

² See, e.g., BellSouth at p. 5; USTA at p. 4.

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future. It makes more sense from all aspects to address the initial allocations of the separations process first and then address any residual effects of access cost allocations.

Any cost allocations contain a degree of arbitrariness from an economic perspective. Changing the allocation of general purpose computer expense prior to overall separations reform will not improve on the accuracy of the allocation.

Arbitrariness is particularly true with the proposed cost allocations. Either of the proposed allocations would continue the allocation of the total general support facilities investment between the jurisdictions based on a single allocator for all of the investment. Then that single interstate amount would be segregated into two categories (presumably based on some unspecified analysis of unseparated investment) and then the interstate amount would be allocated based on two other allocators, not related to the jurisdictional allocation factor or the categorization analysis. This is a prime example of perverse cost allocation at its worst.

BellSouth also notes that there has been no evidence provided that Part 69 rules do not allocate a reasonable share of costs to the billing and collection category. This is particularly true when one considers the fact that the Commission has just authorized a separate separations change for other billing and collection expense, which generally results in more costs being assigned to the interstate jurisdiction and most of these costs in turn being assigned to the billing and collection category. Assigning additional costs to the billing and collection category will increase the vulnerability of local exchange carriers' billing and collection services to competition from other billing and collection providers or from the customer/competitor's own billing and collection services.

The proposed change is not warranted by any quantitative evidence that access charges are being unfairly burdened or that additional cost needs to be allocated to the billing and

collection category. None of the proposals put forth by the Commission or the commentors in this proceeding provide sufficient rationale or quantitative evidence to change the allocation at this time, and thus, such a change would be arbitrary and capricious. Addressing the underlying allocations in a separations reform proceeding and then adjusting the access cost allocation rules, if necessary, would be a much more reasoned and reasonable alternative. Any action must be based on a careful analysis of quantitative evidence, which has not been provided in the current proceeding.

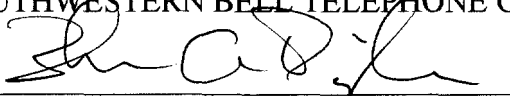
CONCLUSION

For the foregoing reasons, and those contained in our Comments filed earlier in this proceeding, the SBC Companies respectfully request that the Commission not adopt its tentative decision to assess PICCs on special access lines, and not reallocate any expenses for the use of the general purpose computers for billing and collection functions in FCC Part 69.

Respectfully submitted,

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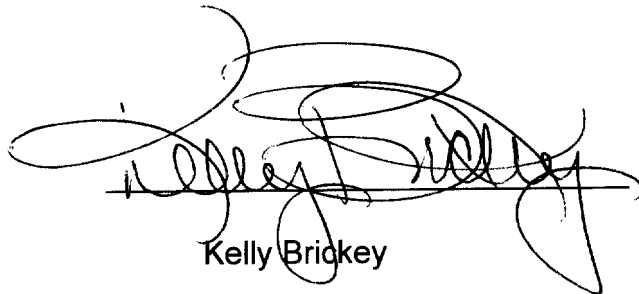
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CERTIFICATE OF SERVICE

I, Kelly Brickey, hereby certify that the foregoing "Reply Comments of Southwestern Bell Telephone Company", have been served on July 11, 1997, to the Parties of Record.



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